

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
 V.) Criminal No. 15-36
)
ELIZABETH MCMAHAN)

MOTION TO POSTPONE SENTENCING AND RELATED DEADLINES

AND NOW, comes the defendant, Elizabeth McMahan, by her attorney, and with respect to the above captioned matter, she represents the following:

1. Assistant United States Attorney Christian Trabold consents to the relief sought herein.
2. The Defendant's Position with Respect to Sentencing Factors is due to be filed on May 24, 2019. Sentencing is scheduled for June 17, 2019 at 1:30 p.m.
3. Defendant requests a 30 day postponement of the sentencing hearing, and a corresponding 30 day extension of the deadline to file her Position with respect to sentencing factors.

4. The Presentence Report includes a 16 level enhancement for a "loss", which is alleged to be more than \$1,500,000 and less than \$3,500,000.

5. The postponement sought herein will provide the parties and respective counsel with sufficient time to meet and thereby undertake to resolve disputed issues relating to loss and corresponding issues relating to restitution.

6. In that regard undersigned counsel and Mr. Trabold are planning to meet in the workweek commencing on May 28, 2019. The purpose of that meeting is to address these still unresolved issues.

WHEREFORE, the defendant, Elizabeth McMahan, respectfully requests that the sentencing be postponed to a date no earlier than July 17, 2019, and the other deadlines be postponed accordingly. She further prays that the deadline for filing her Position with Respect to Sentencing Factors be postponed until June 24, 2019.

Respectfully submitted,

S/ Thomas Livingston

Thomas Livingston
Assistant Federal Public Defender
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